

JAJ:CHB

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

11-193

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UNITED STATES OF AMERICA

C O M P L A I N T

-against-

RAPHAEL GONZALEZ,
also known as "Feo,"

(T. 21 U.S.C. § 846)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

AMILLITA MARAYAG, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such:

In or about and between 2007 and 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RAPHAEL GONZALEZ, also known as "Feo," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Section 846)

The source of your deponent's information and the grounds for her belief are as follows:

1. I have been a Special Agent with the FBI for approximately 5 years. I am currently assigned to a unit that

investigates individuals and criminal organizations that are involved in violent crimes and narcotics trafficking offenses. During my tenure with the FBI, I have investigated numerous criminal organizations involved in violent crimes and narcotics trafficking offenses. During the course of those investigations, I have conducted physical surveillance, undercover operations, debriefed cooperating witnesses and confidential informants, and interviewed civilian witnesses.

2. Because this affidavit is being submitted for the purpose of establishing probable cause to arrest, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. The information set forth below is based upon my training and experience as an FBI agent, my review of documents and other evidence, debriefing of witnesses, and my discussions with other law enforcement officials. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only.

3. I and other law enforcement agents have been involved in an investigation into criminal activity in and around a public housing development in Brooklyn. In support of that investigation, law enforcement made approximately 200 undercover purchases of crack cocaine. Many of these undercover purchases were recorded by surveillance video.

4. Multiple individuals associated with the government's investigation have identified the defendant RAPHAEL GONZALEZ, also known as "Feo," as a narcotics trafficker. For instance, I am informed by, among others, two cooperating witnesses whose identities are known to the government (CW #1 and CW #2), that the defendant RAPHAEL GONZALEZ, also known as "Feo," was an active member of a narcotics trafficking organization operating in the housing development and was involved in the distribution of more than 50 grams of crack cocaine in and around the public housing development in or about 2008.¹ CW #1 and CW #2 have both identified a photograph of the defendant.

6. On February 22, 2011, defendant GONZALEZ was arrested by law enforcement in Brooklyn, New York. Following his arrest, GONZALEZ was orally advised of and waived his Miranda rights. After he waived his rights, GONZALEZ admitted that he was a member of the criminal organization and that the organization was involved in the distribution of more than 50 grams of crack cocaine in and around the public housing development in or about 2008.

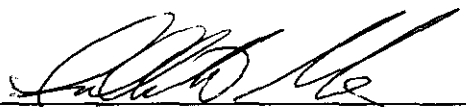

7. Defendant RAPHAEL GONZALEZ has previously been convicted of a felony offense involving the distribution of

¹ CW #1 and CW #2 have both pleaded guilty, pursuant to cooperation agreements, to various crimes, including participation in a conspiracy to distribute 50 grams of more of crack cocaine. As part of their agreements with the government, CW#1 and CW#2 have been debriefed by law enforcement on numerous occasions, and the information that they have provided has been shown to be credible because it has been corroborated by other sources.

narcotics, for which he served a sentence of approximately 6 years. He was released from custody in July 2007.

8. The government's investigation into the defendant's conduct is ongoing.

WHEREFORE, your deponent respectfully requests that defendant RAPHAEL GONZALEZ, also known as "Feo," be dealt with according to law.



SPECIAL AGENT AMILLITA MARAYAG
Federal Bureau of Investigation

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK